

EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA**

ELIZABETH SINES et al,

Plaintiffs

CASE NO: 3:17cv00072

(J. Moon, Magistrate J. Hoppe)

vs.

JASON KESSLER et al.,

Defendants

AMENDED INITIAL DISCLOSURES OF CERTAIN DEFENDANTS

Now come Defendants Jason Kessler, Christopher Cantwell, Vanguard America, Robert Ray, Nathan Damigo, Elliott Kline, Identity Evropa, Matthew Heimbach, Matthew Parrott, Traditionalist Worker Party, Jeff Schoep, National Socialist Movement, and Nationalist Front, through counsel, and make the following Initial Disclosures:

A. Individuals likely to have discoverable information that defendant may use to support his defenses:

- 1. All parties to this action;**
- 2. Anyone listed on any parties initial Disclosures;**
- 3. Det. Wendy Lewis, Charlottesville VA Police Department**
- 4. Currently unidentified members of the Charlottesville VA Police Department;**
- 5. Ms. Nina-Alice Antony, Commonwealth's Attorney's Office Room 331, City Hall, Charlottesville VA, 22902**
- 6. Currently unidentified members of the Virginia State Police**
- 7. Currently unidentified members of the Virginia National Guard**
- 8. Currently unidentified first responders from Charlottesville VA and it's vicinity;**
- 9. Mayor Mike Signer, Charlottesville VA;**
- 10. Mr. Al Thomas, former Chief of Police, Charlottesville VA;**
- 11. Mr. Wes Bellamy, member of City Council, Charlottesville VA;**
- 12. Currently unidentified members or former members of the office of the Governor of the Commonwealth of Virginia;**
- 13. Mr. Terry McAuliffe, former Governor of the Commonwealth of Virginia.**

Each of the above witnesses may be called upon to testify as to his/her knowledge of the facts, circumstances and allegations surrounding plaintiff's complaint, including, but not limited to defendant's alleged actions and the actions of the plaintiffs. This testimony may include, but may not be limited to, the fact and circumstances

surrounding the events which are the subject of this lawsuit. These individuals may also be requested to produce and identify documents which may be relevant to the issues in this case and to testify regarding policies and procedures.

Defendant reserves the right to call additional witnesses as may become known through discovery and reserves the right to call any witness disclosed by any other party.

B. Defendants will or may rely upon the following documents:

1. None other than to be used solely in rebuttal;
2. Any documentary evidence disclosed by any other party.

Defendants reserve the right to introduce into evidence any document identified by any party in disclosures or discovery.

C. It is the position of the defendants that plaintiffs are not entitled to any damages.

D. Insurance: N/A

Respectfully Submitted,

s/ [James E. Kolenich](#)

James E. Kolenich (0077084)

9435 Waterstone Blvd. #140

Cincinnati, OH 45249

Telephone: 513-444-2150

Facsimile: 513-297-6065

Attorney for listed Defendants

Email: jek318@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was *served via email* on January 24, 2018,
upon: Christopher B. Greene, Esq., One of the *Attorneys for Plaintiffs*,
cgreene@kaplanandcompany.com

s/James E. Kolenich

James E. Kolenich